

## August 13, 1999

To: Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Mr. Thomas Martin Associate Regional Counsel U. S. EPA - Region 5 77 West Jackson Boulevard (C-14J) Chicago, Illinois 60604-3590

Ms. Candy Morin
Illinois Environmental Protection Agency
1021 North Grand Avenue East,
P. O. Box 19276
Springfield, Illinois 62794-9276

Re: Support Sampling Plan for Sauget Sites Area I January 21, 1999
Administrative Order by Consent

o Revisions to Solutia's June 25 1989 Support Sampling Plan Submittal

Mr. McAteer, Mr. Martin and Ms. Morin,

Enclosed are revisions to Solutia's June 25, 1999 Support Sampling Plan ("SSP"). These revisions are responsive to the Agencies' July 16, 1999 comments (with one exception) on the sune 25, 1999 Revised SSP submittal, consistent with Solutia's anderstanding of the agreements reached in the July 27, 1999 meeting in Collinsville to discuss the

The one exception is Western's comment that the ecological samples be collected after completion of sediment sampling analyses. This approach for selection of ecological sampling locations will extend the project schedule by 8 months (see schedule in sSP). Based on the Agency's expressed strong decire to complete the Work in as short a time as is reasonable, Solutia recommends and intends to implement the 18 month schedule (also included in the SSP), which precludes the sequencing of ecological sampling after sediment analyses completion. The 18 month schedule requires that the ecological sampling begin in September and end in October, 1999. Sediment cample results will not be completed until January 2009. If ecological sampling followed receipt of these results, this activity could not begin until May/June 2000 - the next growing season.

comments. Since the affected number of pages were relatively small, only the revised pages are included in this transmittal (along with a guide for insertion into the original June 25, 1999 document).

If the SSP is approved the week of August 16, Solutia is prepared to begin work in the field the week of September 13. However, we are approaching the latest time of the year when work started can be efficiently completed before winter weather begins to create delays. Because of the seasonal issues involved, if the ecological sampling cannot be started in September, the next opportunity will be May / June of 2000 - the next growing season. Also, given the nature of the groundwater sampling program, it cannot be done in severe winter weather. We need to start the Work in September - at the latest - so that the majority of the weather sensitive tasks can be completed before December.

If we have any remaining misunderstandings, we would be happy to discuss further to reach rapid resolution.

Sincerely,

D. M. Light

Manager, Remedial Projects

Solutia Inc.

cc:

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